

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

**BLOOMFIELD NURSING
OPERATIONS LLC et al.,**

Plaintiffs,

v.

**AMERIGROUP CORPORATION et
al.,**

Defendants.

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Civil Action No. 4:17-cv-00709-O

**JOINT MEDIATION REPORT
AND MOTION FOR STAY OF PROCEEDINGS**

Plaintiffs and Defendants (collectively, the “Parties”) , through undersigned counsel and in compliance with section II, paragraph 5 of the Court’s Scheduling Order dated October 12, 2017, provide this joint mediation report.

1. The Parties participated in a mediation in Fort Worth, Texas, on April 17, 2008.

Attorney David Seidler served as the mediator due to the unexpected availability of Attorney Len Wade.

2. Attorney Gary J. Van Luchene participated for Plaintiffs, along with client representative C. Kent Harrington (in person), a Member and Manager of the parent LLC of Plaintiffs.
3. Attorney Jonathan Garlough participated for Defendants, along with client representatives Laura Hopkins, President and Chief Executive Officer, Amerigroup Community Care of New Mexico, 2009-11 (in person), Leigh Davidson, VP of Health Plan Operations, Amerigroup Community Care of New Mexico (in person), and Jeff Stredler, Anthem Senior Associate General Counsel (by telephone).

4. Both parties were represented by individuals with authority to settle the dispute.
5. The Parties report that the mediation was successful and the Parties have reached an agreement regarding the settlement of the case. However, because a number of Plaintiff parties are debtors in a pending bankruptcy action in the United States Bankruptcy Court for the Northern District of Texas, the settlement will require approval by that Court and will not be effective until the entry of a final order that is not subject to appeal.
6. The Parties will work diligently to prepare a formal agreement and mutual release documenting the terms of the settlement, and Plaintiffs will present the terms to the bankruptcy court for approval.
7. While this approval process is pending, the Parties jointly request that this action be stayed in its entirety.

Respectfully submitted,

KELEHER & MCLEOD, P.A.

By: /s/ Gary J. Van Luchene

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